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Attorney for Defendant Northern Marianas College

IN THE UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN MARIANA ISLANDS

GERI L. WILLIS,	)	CIVIL ACTION NO. 07-0014
	)	
Plaintiff,	)	
	)	
vs.	)	DEFENDANT
	)	NORTHERN MARIANAS COLLEGE
NORTHERN MARIANAS COLLEGE	)	ANSWER
and	)	TO PLAINTIFF'S COMPLAINT
DOES I – V	)	
	)	
Defendant.	)	

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NORTHERN MARIANAS COLLEGE, through counsel, hereby answers plaintiff's complaint as follows:

1. In answer to the allegations in paragraph 1, defendant NMC admits that this court has jurisdiction.

2. In answer to the allegations in paragraph 2, defendant NMC admits that the Complaint alleges unlawful employment practices were or are now being committed in Saipan. The rest and remainder of the allegations in paragraph 2 are denied.

1           3.     The allegations in paragraph 3 are admitted.

2           4.     The allegations in paragraph 4 are admitted.

3           5.     The allegations in paragraph 5 are admitted.

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5           6.     In response to the allegations in paragraph 6, defendant NMC admits that plaintiff is  
6 suing defendant Does I through V by fictitious names. The rest and remainder of the allegations in  
7 paragraph 6 are denied.

8           7.     In response to the allegations in paragraph 7, defendant NMC admits that plaintiff filed  
9 a charge of discrimination with the EEOC on or about January 26, 2006, and that the charge alleged  
10 violations of the ADEA. The rest and remainder of the allegations in paragraph 7 are denied.

11           8.     The allegations in paragraph 8 are legal conclusions to which no answer is required. To  
12 the extent an answer is required, the allegations are denied.

13           9.     The allegations in paragraph 9 are legal conclusions to which no answer is required. To  
14 the extent an answer is required, the allegations are denied.

15           10.    The allegations in paragraph 10 are legal conclusions to which no answer is required.  
16 To the extent an answer is required, the allegations are denied.

17           11.    The allegations in paragraph 11 are legal conclusions to which no answer is required.  
18 To the extent an answer is required, the allegations are denied.

19  
20           12.    Paragraph 12 is an incorporating paragraph to which no response is required. To the  
21 extent an answer is required, defendant NMC repeats its answers in paragraphs 1 – 11 herein.

22           13.    The allegations in paragraph 13 are legal conclusions to which no answer is required.

1 To the extent an answer is required, the allegations are denied.

2 14. The allegations in paragraph 14 legal conclusions to which no answer is required. To  
3 the extent an answer is required, the allegations are denied.

4 15. The allegations in paragraph 15 are legal conclusions to which no answer is required.  
5 To the extent an answer is required, the allegations are denied.

6 16. The allegations in paragraph 16 are legal conclusions to which no response is required.  
7 To the extent a response is required, the allegations are denied.

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9  
10 **AFFIRMATIVE DEFENSES**

11 1. Plaintiff voluntarily resigned from her position.

12 2. Plaintiff has failed to state a claim upon which relief may be granted.

13 3. Defendants are entitled to discretionary immunity.

14 4. Defendants reserve the right to assert additional defenses that might arise during the  
15 course of this proceeding, as discovery warrants.  
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17  
18 **PRAYER FOR RELIEF**

19 WHEREFORE, Defendants request the following relief:

20 1. That Plaintiff take nothing by reason of the Complaint.

21 2. That the Court dismiss the Complaint with prejudice.  
22

1 3. For such other and further relief as the Court deems just and equitable.

2 Respectfully submitted,

3  
4 DATED 5<sup>th</sup> day of October, 2007

/s/

5 Linda L. Waugh #T0046

6 Assistant Attorney General

7 Attorney for Defendants